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October 15, 2015

Ms. Jan Palumbo (AWT-150)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: September/October 2015 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the September 2015 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from September 15, 2015, to October 14, 2015.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- A comprehensive round of groundwater sampling was conducted during the week of September 14, 2015. The preliminary results were received and are in the process of being validated. Sorbent socks were checked and weighed.
- In August and early September, the CMS was revised (Version 4) to incorporate the results of the oxidation bench scale study and incorporate EPA comments. EPA informed the Baxter team that Battelle had been contracted to review the data from the site and provide corrective measure recommendations to EPA. EPA requested that the Baxter team place the CMS on hold until the Battelle report is completed and EPA and Baxter teams have met to discuss the ramifications of the Battelle recommendations. No work was conducted on the CMS this month pending direction from EPA.
- The recirculation system ran at approximately 30 gpm without any shutdowns or alarms. Extraction wells EW-1, EW-2 and EW-4 were set to operate during the early September site visit.

### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

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- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period. A Site visit is scheduled for October 15 to replace the oxygen cylinders.
- EPA will provide the Baxter team with the Battelle report and set up a technical meeting to discuss the path forward.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Results from sampling conducted in September are pending validation.

### CERTIFICATION

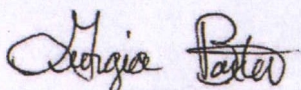
I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: April 8, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology





Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group

